

### REMARKS

There seems to be some confusion regarding the interpretation of claim 12 of the parent application which has been replaced by new claim 21. Claims 12, as well as claim 21, was directed to a feature of the invention depicted in Fig. 5a wherein the wall 75 of the recess 66 diverges from an opposite wall 75a of the recess in a direction away from the open end of the recess, when the leaf 74 is in a relaxed state as shown in Fig. 5a, thereby forming an angle 110. That guarantees that when the leaf 74 is bent toward the wall 75a (i.e., to a clamping position) upon the insertion of a wedge into the channel 86, the upper or outer edge 74a of the wall 75 will engage the insert, and that such engagement will constitute the initial engagement, so that the insert-retaining forces will be concentrated near an outer (upper) portion of the insert for better retention thereof.

In contrast, Charlton U.S. Patent 1,707,903 (relied upon in the parent application) discloses an insert-receiving recess 3 wherein a wall thereof that is formed by a bendable leaf 11 converges toward an opposite wall of the recess in a direction away from the open end of the recess, which is the opposite of the diverging relationship recited in claim 21. When Charlton's leaf-bending wedge 14 is inserted, the leaf 11 is bent clockwise to the clamping position, presumably so that a wall of the leaf will engage with an adjacent side of the insert. Due to normal manufacturing tolerances, it may occur that such engagement initially occurs at some random location along the insert's side, e.g., near the bottom (inner end) of the insert, which would prevent clamping forces from being concentrated near the upper end of the insert; in fact it is possible that no contact would occur between the leaf and the insert near the insert's outer end. Accordingly, Charlton's structure does not guarantee an optimum insert retention.

That shortcoming is avoided by the presently claimed invention which guarantees that the engagement will occur at the outer end of the clamping wall and thus near the outer end of the insert since the wall 75 diverges (not converges) relative to the wall 75a in a direction away from the open end of the recess.

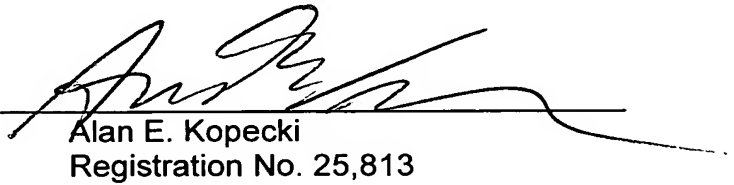
Accordingly, it is submitted that the present claims distinguish patentably over  
Charlton.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

Date: April 14, 2004

By: \_\_\_\_\_

  
Alan E. Kopecki  
Registration No. 25,813

P.O. Box 1404  
Alexandria, Virginia 22313-1404  
(703) 836-6620